

November 22, 2019

Via ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**Re: *American Civil Liberties Union v. Office of Justice Programs*
No. 19-cv-5483 (RA)**

Dear Judge Abrams:

Pursuant to the Court's order at the telephonic October 24, 2019, status conference, the parties jointly submit this status letter.

I. Status of Documents Produced

On November 11, 2019, Defendants produced a third interim production consisting of the remaining documents responsive to Plaintiffs' first two FOIA requests. ECF No. 1 ¶ 26(a), (b).

II. Remaining Production

On November 13th and November 20th, the parties conferred telephonically regarding the review and production of documents responsive to Plaintiffs' remaining FOIA requests.

For purposes of this litigation, Plaintiff has agreed to narrow the remaining requests to the time period of June 28, 2018, through the date that the Office of Justice Programs ("OJP") conducted the search for responsive documents. OJP estimates that with this narrowed request and continuing its current rate of review, barring any new developments, such as the need for consultation with third parties to clear release of documents, the agency can complete review and production in approximately four months.

Accordingly, the parties have agreed that Defendants will produce responsive documents on a monthly basis beginning January 15, 2020 until the production is complete. Review and production of documents, absent any developments, will be completed by **March 31st, 2020**.

The parties look forward to continuing to work together to narrow the issues and propose to submit a joint status letter by March 10, 2019, to advise the Court on the status of the case, including any need for motion practice.

We thank the Court for its consideration of this matter.

Respectfully Submitted,

/s/ Sarah Hinger

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